

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-03700007-2012**
Application Received: **January 28, 2011**
Plant Identification Number: **037-00007**
Permittee: **Ox Paperboard, LLC**
Facility Name: **Halltown Mill**
Mailing Address: **P. O. Box 70, Halltown, WV 25423**

Revised: NA

Physical Location:	Halltown, Jefferson County, West Virginia
UTM Coordinates:	776.32 km Easting • 4356.17 km Northing • Zone 17
Directions:	From Charles Town proceed East on U.S. Route 340 to Halltown Road. Turn left off of U.S. Route 340 onto Halltown Road, the facility is located on the left approximately two (2) miles from the intersection of U.S. Route 340, Jefferson County.

Facility Description

Ox Paperboard LLC is a producer of 100% recycled paperboard from recovered papers. The facility operates under Standard Industrial Classification (SIC) Code 2631. The facility consists of one coal fired boiler, the paper mill, a carpenter shop, a waste water treatment plant, an emergency generator, truck traffic, and welding equipment.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions*	2010 Actual Emissions
Carbon Monoxide (CO)	75.2	26.28
Nitrogen Oxides (NO _x)	165.7	57.75
Particulate Matter (PM ₁₀)	31.1	28.37
Total Particulate Matter (TSP)	52.4	47.09
Sulfur Dioxide (SO ₂)	481.4	321.51
Volatile Organic Compounds (VOC)	1.3	0.27
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions*	2010 Actual Emissions
Hydrochloric Acid	42.13	15.32
Other Miscellaneous HAPs	2.38	0.83

Some of the above HAPs may be counted as PM or VOCs.

*Note – The change in Potential Emission are attributed to the following factors:

- Usage of recent stack testing results for SO₂ and PM.
- Change in coal supplier, resulting in changes to the coal's properties (especially chlorine content).
- Usage of recent coal analysis data for sulfur and chlorine content.
- Revised emission calculations methodologies, including the calculation of multiple hazardous air pollutant species emitted by coal combustion.

Title V Program Applicability Basis

This facility has the potential to emit 481.4 tons per year of SO₂, 165.7 tons per year of NO_x and 42.13 tons per year of hydrochloric acid. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Ox Paperboard, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:

45CSR2	To Prevent And Control Particulate Air Pollution From Combustion Of Fuel In Indirect Heat Exchangers
45CSR6	Open burning prohibited.
45CSR7	To Prevent And Control Particulate Matter Air Pollution From Manufacturing Processes And Associated Operations
45CSR10	Control of Sulfur Dioxide Emissions from Indirect Heat Exchangers

45CSR11	Standby plans for emergency episodes.
45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
WV Code § 22-5-4 (a) (14)	The Secretary Can Request Any Pertinent Information Such As Annual Emission Inventory Reporting.
45CSR30	Operating Permit Requirement.
45CSR34	Emission Standards For Hazardous Air Pollutants
40 C.F.R. Part 61	Asbestos Inspection And Removal
40 C.F.R. Part 82, Subpart F	Ozone Depleting Substances
40 C.F.R. Part 63, Subpart ZZZZ	National Emissions Standards For Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines
40 C.F.R. Part 63, Subpart DDDDD	National Emission Standards For Hazardous Air Pollutants For Industrial, Commercial, And Institutional Boilers And Process Heaters
40 C.F.R. Part 64	Compliance Assurance Monitoring
<u>State Only:</u>	
45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-0622	September 1, 1981	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

This is a renewal of the Title V permit which was issued on August 21, 2006. Changes to the most recent version of the Title V Permit consist of the following:

1) Title V Boilerplate changes

- Condition 1.2. - This condition has been added to show the latest version of any Rule 13, 14, and 19 permits with the Issuance date of such permit.

- Condition 2.1.4. – This condition has been added and states: *Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a “rolling yearly total” shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.*
 - Condition 3.1.1. and 3.1.2. – These conditions were revised because the language in 45CSR§§6-3.1. & 3.2. was revised.
 - Condition 3.1.3. - The citation of authority was changed because 45CSR15 was repealed and 40 CFR 61 is now incorporated into 45CSR34. Also expanded 40 C.F.R. 61 citation to 40 C.F.R. §61.145(b). Slight language revision.
 - Condition 3.3.1. – Subsection “d” was added to this condition. Also section 14 of WV Code §§22-5-4 (a) was added in the citation of authority.
 - Condition 3.5.3. and 3.5.5. - These conditions were revised to require electronic submittal of the annual certification to USEPA. The certification shall now only be submitted to the USEPA by e-mail.
- 2) **Condition 1.1.** – The design capacity for the Paperboard Mill has been changed in the “Emission Units” table from 200 tons/day to 73,000 tons/year per the permit application and the facility’s request. The actual design capacity has not changed.
- 3) **Condition 3.7.2.a.** – 45CSR1 was deleted from the non-applicable permit shield section because this state rule has been repealed. Also 40 CFR 63 Subpart S and 40 CFR Subpart JJJJ were added to this condition since these subparts are not applicable to the facility and the facility requested a permit shield.
- 4) **40 CFR 63 Subpart DDDDD (Boiler MACT)** – The boiler is subject to this Subpart. Therefore, conditions 4.1.12. and 4.1.13. have been added to the renewal permit [*Note: Subpart DDDDD is currently being revised by USEPA per Court Order, and as of November 23, 2011, this subpart is not yet effective.*]
- 5) **Conditions 4.3.1. and 4.3.2.** – These conditions have been updated to reflect the most recent test dates and results.
- 6) **40 CFR 63 Subpart ZZZZ (RICE MACT)** - Condition 6.1.1. was added to incorporate by reference the MACT requirements of 40 CFR 63 Subpart ZZZZ applicable to the emergency generator engine, in order to ensure that the facility will meet the compliance date of May 3, 2013. Because it is likely that some of the Subpart ZZZZ requirements for emergency reciprocating internal combustion engines (RICE) will be revised by USEPA, and since the compliance date is not until the year 2013, the specific requirements were not listed in the renewal permit.
- 7) **40 CFR 64 Compliance Assurance Monitoring (CAM).** This is the second permit renewal for this facility. A CAM plan was submitted during the first renewal and the CAM requirements were included in the first renewal permit. Therefore, another CAM applicability determination is not required.
- Although a full CAM review was not performed, CAM language and requirements that were omitted in the last renewal were added to the permit in conditions 4.2.6.through 4.2.9. inclusive. Also, the 40 CFR Part 64 citation of authority was changed in conditions 4.2.1., 4.2.3., 4.2.5., 4.4.1 and 4.5.1. to more specific Part 64 rule sections.

- The table below was moved from the permit to this section of the fact sheet. It was in the permit primarily for informational purposes and not necessarily as a permit requirement. As such, it should be in the fact sheet and not the permit. The CAM requirements are contained in permit conditions 4.2.1., 4.2.3. and 4.2.5. - 4.2.9., 4.4.1. and 4.5.1.)

CAM Plan Summary of Requirements

	Indicator No. 1	Indicator No. 2
I. Indicator	Differential Pressure Drop Across Baghouse	Inspection and Maintenance of Baghouse
Measurement Approach	Pressure differential gauges are installed in the appropriate locations on each baghouse compartment.	Visible Emissions are monitored by 40 CFR60, Method 9 certified individuals.
II Indicator Range	An excursion is defined as a 4 hour average outside 4" – 6" water column range.	An excursion is defined as a six minute block average of 15-second readings greater than 10% opacity
II Performance Criteria		
I.		
A. Data Representativeness	The pressure gauges are mounted in the appropriate locations on each compartment of the baghouse. The differential pressure across the baghouse can be determined from the gauges. A field test correlates the differential pressure operating range to PM concentration measured by Method 5. The indicator ranges falls within the manufacturer's recommendations.	Visible Emissions are taken on a weekly basis by individuals trained and certified in accordance with 40 CFR 60 Method 9. A field test correlates the opacity to PM concentration measured by Method 5. Additionally, daily inspections of the baghouse are performed.
B. Verification of Operational Status	Initial correlation test conducted October 2003. Manufacturer's recommendations.	Initial correlation test conducted October 2003.
C. QA/QC Practices and Criteria	Gauges are examined weekly to ensure they are functioning properly.	Trained personnel take VE readings and are attend semiannual training and recertification classes. Personnel perform inspections and maintenance.
D. Monitoring Frequency	Hourly	Once per week VE readings. Daily inspections.
Data Collection Procedures	Manual log entries.	Manual log entries.
Averaging Period	Four hours.	Six minute block average, based on 15-second readings unless a 60 minute is required.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the reasons stated:

- a. 40 CFR 60,
Subpart Db – *Standards of performance for Industrial-Commercial-Institutional Steam Generating Units.* The coal-fired boiler 001 (BLR-2) commenced construction

prior to and has not undergone a modification or reconstruction after June 19, 1984.

- b. 40 CFR 60,
Subpart K – *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978.* Halltown does not utilize storage vessels for petroleum liquids as defined in the rule.
- c. 40 CFR 60,
Subpart Ka – *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984.* Halltown does not utilize storage vessels in the capacity for which this subpart is applicable
- d. 40 CFR 60,
Subpart Kb – *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.* Halltown has not commenced construction, modification, or reconstruction of storage tank 002-03 since July 23, 1984 and therefore is not subject to this subpart
- e. 40 CFR 60,
Subpart BB – *Standards of Performance for Kraft Pulp Mills.* Halltown does not operate a kraft pulp mill.
- f. 40 CFR 63,
Subpart S – *National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry:* Halltown utilizes mechanical pulping of recycled material. The Halltown process does not include digesters, bleaching operations, or chemical pulping processes in its papermaking process.
- g. 40 CFR 63,
Subpart JJJJ - *National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating:* The Halltown process does not include web coating lines and does not include the application of web coating materials in its papermaking process.
- h. 40 CFR 68 – *Chemical Accident Prevention Provisions.* Halltown does not use in a process, any regulated substance listed in 40 CFR 68.130 in an amount above the threshold quantities listed under 40 CFR 68.115.
- i. Greenhouse Gas (GHG) Permitting - This is a renewal Title V permit and there have not been any modifications that would have triggered a PSD permit. Therefore, there are no applicable GHG requirements

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: November 23, 2011
Ending Date: December 23, 2011

All written comments should be addressed to the following individual and office:

Frederick Tipane
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Frederick Tipane
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1215 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.